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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

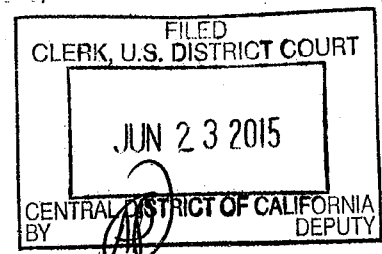
13 NATIONAL CREDIT UNION
14 ADMINISTRATION BOARD, as
15 Liquidating Agent of Western Corporate
Federal Credit Union,

16 Plaintiff,

17 vs.

18 RBS SECURITIES INC. *et al.*,

19 Defendants.



Case No. CV 11-05887 GW (JEMx)

**APPLICATION TO FILE
DOCUMENTS UNDER SEAL**

[L.R. 79-5.1]

Judge: George H. Wu
Courtroom: 10

Complaint Filed:
July 18, 2011

First Amended Complaint Filed:
August 19, 2013

Second Amended Complaint Filed:
November 14, 2014

1 Pursuant to Local Rule 79–5.1, Defendants RBS Securities Inc. and RBS
2 Acceptance Inc. (collectively “RBS”) hereby request permission from the Court to file
3 under seal the following documents:

- 4 1. An unredacted version of Defendants’ Letter Motion Seeking Additional
5 Deposition Time (the “Letter Motion”), a redacted version of which was
6 attached as Exhibit 1 to the concurrently filed Notice of Filing of Defendants’
7 Letter Motion.
- 8 2. Exhibits A, B, C, D, and F to Defendants’ Letter Motion.

9 The Court has entered a Master Protective Order relating to this action. ECF
10 No. 318. The Master Protective Order states that:

11 In the event that before trial in the Related Actions, or in connection with any
12 hearing in or any matter relating to the Related Actions, counsel for any Party
13 determines to file or submit in writing to the Clerk's office any Protected
14 Material, or any papers containing or making reference to the substance of such
15 material or information, such documents or portions thereof containing or
16 making reference to such material or information shall be filed with a request
that the documents be filed under seal in accordance with the rules of the Court,
and kept under seal until further order of the Court.

17 Plaintiff National Credit Union Administration Board designated Exhibits A
18 through D to Defendants’ Letter Motion as Highly Confidential under the Master
19 Protective Order. Exhibit F is an email from counsel for RBS to counsel for Plaintiff,
20 and references discovery material Plaintiff designated Confidential. In accordance
21 with Paragraph 9 of the Master Protective Order, RBS requests that a unredacted
22 version of Defendants’ Letter Motion and Exhibits A, B, C, D, and F to that motion be
23 filed under seal in accordance with the rules of the Court, and kept under seal until
24 further order of the Court.

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2 DATED: June 22, 2015

Respectfully submitted,

3 KIRKLAND & ELLIS LLP

4 Alex Pilmer
5 R. Alexander Pilmer
6 David I. Horowitz

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7 Attorneys for Defendants RBS Securities Inc.
8 and RBS Acceptance Inc.
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